

FILED

**UNITED STATES DISTRICT
NORTHERN DISTRICT OF CAL**

CRIMINAL COVER SH

Mar 24 2022

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

Instructions: Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

CASE NAME:**CASE NUMBER:**

USA v. BABAK BROUMAND and MALAMATENIA MAVROMATIS

CR CR 21-162 WHO

Is This Case Under Seal?

Yes

No ☒**Total Number of Defendants:**

1

2-7 ☒

8 or more

Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?

Yes

No ☒**Venue (Per Crim. L.R. 18-1):**SF ☒

OAK

SJ

Is this a potential high-cost case?

Yes

No ☒**Is any defendant charged with a death-penalty-eligible crime?**

Yes

No ☒**Is this a RICO Act gang case?**

Yes

No ☒**Assigned AUSA****(Lead Attorney):** RUTH C. PINKEL, SAUSA**Date Submitted:** 3/24/2022**Comments:**

RESET FORM

SAVE PDF

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

UNITED STATES OF AMERICA,

V.

BABAK BROUMAND and
MALAMATENIA MAVROMATIS, a/k/a MALAMATENIA
MAVROMATIS BROUMAND,

DEFENDANT(S).

SUPERSEDING INDICTMEN

FILED

Mar 24 2022

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

18 U.S.C. § 1001(a)(2) – False Statement to a Government Agency;
18 U.S.C. § 1014 – False Statement to a Financial Institution;
26 U.S.C. § 7206(1) – Subscribing to a False Tax Return

A true bill.

/s/ Foreperson of the Grand Jury

Foreman

Filed in open court this 24th day of

March, 2022

Clinckenberg

Clerk

LBC

Bail, \$ Summons

STEPHANIE M. HINDS (CABN 154284)
United States Attorney

FILED

Mar 24 2022

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 21-162 WHO
Plaintiff,)	<u>VIOLATIONS:</u>
v.)	18 U.S.C. § 1001(a)(2) – False Statement to a
)	Government Agency; 18 U.S.C. § 1014 – False
BABAK BROUMAND and)	Statement to a Financial Institution;
MALAMATENIA MAVROMATIS, a/k/a)	26 U.S.C. § 7206(1) – Subscribing to a False Tax
MALAMATENIA MAVROMATIS)	Return
BROUMAND,)	
Defendants.)	SAN FRANCISCO VENUE

SUPERSEDING INDICTMENT

The Grand Jury charges:

Introductory Allegations

At all times relevant to this Indictment:

1. Defendant BABAK BROUMAND (“BROUMAND”) was a Special Agent of the Federal Bureau of Investigation (“FBI”), an agency within the executive branch of the United States government, assigned to the San Francisco field division of the FBI.
2. BROUMAND became an FBI agent in January 1999 and was responsible for, among other things, national security investigations. BROUMAND’s responsibilities included recruiting human intelligence sources for the FBI. As an FBI agent, BROUMAND had access to non-public law

FIRST SUPERSEDING INDICTMENT
CR 21-162 WHO

1 enforcement databases, which, pursuant to government regulations, were only to be used to conduct
2 legitimate law enforcement investigations. As a Special Agent with the FBI, BROUMAND was a
3 public official, had a top secret security clearance, and access to sensitive compartmented information
4 (“SCI”).

5 3. Executive Order 12968 established a requirement that all Executive Branch personnel who
6 are granted access to “particularly sensitive classified information,” as a condition of such access, file
7 with the agency head an annual financial disclosure report.

8 4. The FBI Financial Disclosure Program requires employees with access to SCI or who are
9 designated by the Director or Deputy Director of the FBI to file an annual Security Financial Disclosure
10 Form (“Financial Disclosure Form”). Among other things, income of all kinds (including gifts), assets,
11 including vehicles and how they were acquired, and loans are required to be disclosed on the Financial
12 Disclosure Form.

13 5. Before final submission of a Financial Disclosure Form, which is submitted electronically
14 with a password, a certification screen states, “I certify that the entries made by me are true, complete,
15 and accurate to the best of my knowledge and belief and are made in good faith. I understand that
16 knowing and willful false statements on this form can be punished by fine or imprisonment or both (See
17 U.S. Code Title 18, Section 1001).”

18 6. As an FBI Agent with access to SCI, BROUMAND was required to file an annual Financial
19 Disclosure Form. Among other years, BROUMAND filed a Financial Disclosure Form for years
20 including 2015, 2016, and 2017.

21 PARTIES, PERSONS AND ENTITIES

22 7. Defendant MALAMATENIA MAVROMATIS, also known as MALAMATENIA
23 MAVROMATIS BROUMAND (“MAVROMATIS”), was an attorney licensed to practice law in
24 California and worked as an attorney for a company that specialized in real property hazard disclosures
25 for real estate transactions. MAVROMATIS was married to BROUMAND.

26 8. Love Bugs, LLC (“Love Bugs”), was a partnership consisting of a lice-removal hair salon
27 business started in 2007 by BROUMAND and MAVROMATIS, which operated in the Northern District
28 of California. BROUMAND and MAVROMATIS each had fifty percent (50%) ownership of Love

1 Bugs. BROUMAND prepared and filed tax returns, including sales and use tax returns, for Love Bugs
2 with the Internal Revenue Service (“IRS”) and the state of California. BROUMAND also handled the
3 banking, including making deposits of cash and checks, for Love Bugs.

4 9. In approximately 2010, BROUMAND and MAVROMATIS purchased a vacation home on
5 Seventh Avenue in Tahoma, California next to Lake Tahoe (the “First Tahoe House”) with title in their
6 own names. In 2014, BROUMAND and MAVROMATIS recorded a deed transferring title of the First
7 Tahoe House to Love Bugs, LLC. In August 2015, BROUMAND and MAVROMATIS sold the First
8 Tahoe house, realizing a capital gain of approximately \$153,642, and affirmatively represented that it
9 was a corporate sale not required to be reported to the IRS. MAVROMATIS and BROUMAND then
10 took personal possession of the sale proceeds and used the funds money for their own personal purposes.
11 In or about November 2015, MAVROMATIS and BROUMAND used the sale proceeds from the sale
12 of the First Tahoe House by Love Bugs for purchase of a larger vacation home on West Lake Boulevard
13 in Homewood, California the (“Second Tahoe House”) in the names of BROUMAND and
14 MAVROMATIS, but did not report the sale of the First Tahoe House or any capital gains to the IRS.

15 10. Killer Bees Management, LLC (“Killer Bees”), was a partnership created by BROUMAND
16 and MAVROMATIS in approximately 2005. BROUMAND and MAVROMATIS each had fifty percent
17 (50%) ownership of Killer Bees. In approximately 2005, BROUMAND and MAVROMATIS
18 purchased two condominiums in Corpus Christi, Texas, one was on Salt Cay Court and the other was on
19 Gun Cay Court (“Texas condominiums”) with title in their own names. BROUMAND and
20 MAVROMATIS filed Form 1065 U.S. partnership tax returns with the IRS for Killer Bees, which listed
21 gross rents for both condominiums, but only listed the name and address for the condominium on Salt
22 Cay Court. The condominiums were titled in the name of BROUMAND and MAVROMATIS.
23 BROUMAND and MAVROMATIS sold the Texas condominiums in 2015 and realized a capital gain of
24 approximately \$46,182. In or about November 2015, BROUMAND and MAVROMATIS used the sale
25 proceeds from the sale of the Texas condominiums for purchase of the Second Tahoe House in the
26 names of BROUMAND and MAVROMATIS, but did not report the sale of the Texas condominiums or
27 any capital gains to the IRS.

BROUMAND Receives Checks And Ducati Motorcycle

11. Edgar Sargsyan was an individual engaged in criminal conduct and associated with a criminal organization. Among other corporations and entities, Edgar Sargsyan had access to and/or control over bank accounts in the name of Andor'e and ARCA Capital.

12. On or about April 29, 2015, in Los Angeles, California, Sargsyan purchased for BROUMAND a 2015 Ducati Panigale motorcycle and accessories (collectively, "the Ducati") for approximately \$36,100.

13. On or about September 30, 2015, in Beverly Hills, California, Sargsyan gave BROUMAND a \$30,000 cashier's check payable from Andor'e Inc. to Love Bugs, because Sargsyan was making regular payments to BROUMAND, and BROUMAND told Sargsyan he needed it to "buy a house in the mountains."

14. Between September 30, 2015, and October 9, 2015, BROUMAND deposited the \$30,000 cashier's check in the Love Bugs bank account and transferred the funds through two additional bank accounts in his and MAVROMATIS's names. Thereafter, BROUMAND transferred the funds to a title company for purchase of the Second Tahoe House.

15. After the mortgage company questioned the source of the \$30,000, on or about October 21, 2015, BROUMAND submitted to the mortgage company a false bill of sale, dated September 30, 2015, which falsely stated that BROUMAND sold a 1991 Sea Ray boat to Sargsyan for \$30,000.

16. On or about December 15, 2015, BROUMAND, months after he submitted the false bill of sale to the mortgage company, sold the 1991 Sea Ray boat to a third party (not Sargsyan) for approximately \$6,000 in cash.

17. On or about March 21, 2016, BROUMAND solicited another \$30,000 check from Sargsyan, this time payable from ARCA Capital to BROUMAND's parents, which was deposited into BROUMAND's parents' bank account. Several weeks later, \$29,300 of the funds were transferred to a Business A bank account and used to make a payment on the Love Bugs American Express credit card, which BROUMAND used for personal expenses.

//

COUNT ONE: (18 U.S.C. § 1001(a)(2) – False Statement to a Government Agency)

Paragraphs 1 through 17 of this Superseding Indictment are re-alleged and incorporated as if fully set forth here.

On or about April 25, 2016, in the Northern District of California, the defendant,

BABAK BROUMAND,

did willfully and knowingly make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the United States Federal Bureau of Investigation (FBI), an agency of the Executive Branch of the Government of the United States, by failing to report as required on his 2015 calendar year Financial Disclosure Form (1) his receipt of the \$30,000 cashier's check from Edgar Sargsyan and/or Andor'e Inc.; (2) his receipt of the Ducati motorcycle from Edgar Sargsyan; and (3) by falsely stating, in response to a question of how the Ducati was acquired, that it was "purchased." These statements and representations were false because, as BROUMAND then and there knew, he had received the \$30,000 cashier's check from Edgar Sargsyan through an entity called Andor'e Inc. which he should have reported under "Other Income," or as a loan, and he received the Ducati from Sargsyan as "Other Income" and did not purchase it.

All in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT TWO: (18 U.S.C. § 1001(a)(2) – False Statement to a Government Agency)

Paragraphs 1 through 17 of this Superseding Indictment are re-alleged and incorporated as if fully set forth here.

On or about March 24, 2017, in the Northern District of California, the defendant,

BABAK BROUMAND,

did willfully and knowingly make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the United States Federal Bureau of Investigation (FBI), an agency of the Executive Branch of the Government of the United States, by failing to report on his 2016 calendar year annual Financial Disclosure Form his receipt of funds from a \$30,000 check from Edgar Sargsyan through an entity called ARCA Capital. These statements and representations were false because, as BROUMAND then and there knew, BROUMAND had received a \$30,000 check from Sargsyan through an entity called ARCA Capital.

1 All in violation of Title 18, United States Code, Section 1001(a)(2).

2 COUNT THREE: (18 U.S.C. § 1001(a)(2) – False Statement to a Government Agency)

3 Paragraphs 1 through 17 of this Superseding Indictment are re-alleged and incorporated as if
4 fully set forth here.

5 On or about April 27, 2018, in the Northern District of California, the defendant,

6 BABAK BROUMAND,

7 did willfully and knowingly make materially false, fictitious, and fraudulent statements and
8 representations in a matter within the jurisdiction of the United States Federal Bureau of Investigation
9 (FBI), an agency of the Executive Branch of the Government of the United States by representing on his
10 2017 calendar year annual Financial Disclosure Form that he had a \$30,000 “loan” from Edgar
11 Sargsyan. These statements and representations were false because, as BROUMAND then and there
12 knew, Sargsyan did not loan money to BROUMAND but instead provided the money to BROUMAND
13 without any agreement for repayment.

14 All in violation of Title 18, United States Code, Section 1001(a)(2).

15 COUNT FOUR: (18 U.S.C. § 1014-False Statement to a Financial Institution)

16 Paragraphs 1 through 17 of this Superseding Indictment are re-alleged and incorporated as if
17 fully set forth here.

18 On or about September 15, 2015, in the Northern District of California, the defendants,

19 BABAK BROUMAND and
20 MALAMATENIA BROUMAND
a/k/a MALAMATENIA MAVROMATIS,

21 did knowingly make false statements and reports for the purpose of influencing the actions of American
22 Pacific Mortgage Corporation, doing business as Equitable Mortgage Group (“EMG”), a mortgage
23 lending business, in connection with the loan for their purchase of the Second Tahoe House on West
24 Lake Boulevard in Lake Tahoe for approximately \$1.3 million. Specifically, BROUMAND and
25 MAVROMATIS caused to be submitted a Uniform Residential Loan Application for a loan secured by
26 the Second Tahoe House, which stated that the purchase was for an “investment” rather than a
27 “secondary residence,” and provided EMG with a fictitious lease purporting to show the Second Tahoe
28 House was leased to M.W. and T.W. from November 1, 2015, to November 1, 2016, for \$6,550 a

1 month. In truth, and as BROUMAND and MAVROMATIS then knew, they had not leased the Second Tahoe House to M.W. and T.W. and it was the vacation home for BROUMAND and MAVROMATIS.

3 All in violation of Title 18, United States Code, Section 1014.

4 COUNT FIVE: (18 U.S.C. § 1014-False Statement to a Financial Institution)

5 Paragraphs 1 through 17 of this Superseding Indictment are re-alleged and incorporated as if
6 fully set forth here.

7 On or about October 21, 2015, in the Northern District of California, the defendant,

8 BABAK BROUMAND,

9 did knowingly make false statements and reports for the purpose of influencing the actions of American
10 Pacific Mortgage Corporation, doing business as Equitable Mortgage Group (“EMG”), a mortgage
11 lending business, in connection with the loan for his purchase of the Second Tahoe House on West Lake
12 Boulevard in Lake Tahoe for approximately \$1.3 million, which was secured by the Second Tahoe
13 House. Specifically, defendant represented that \$30,000 in funds from a check used for part of the down
14 payment were proceeds from the sale of a boat and provided a purported “Bill of Sale” to “Edgar
15 Sargysian (sic),” a letter signed by BROUMAND, and other false supporting documentation when, in
16 truth and as BROUMAND then knew, he had not sold a boat to Sargsyan and sold the boat over two
17 months later to someone else for far less money. EMG sold this loan to JP Morgan Chase, a financial
18 institution insured by the FDIC.

19 All in violation of Title 18, United States Code, Section 1014.

20 COUNT SIX: (18 U.S.C. § 1014-False Statement to a Financial Institution)

21 Paragraphs 1 through 17 of this Superseding Indictment are re-alleged and incorporated as if
22 fully set forth here.

23 On or about November 2, 2016, in the Northern District of California, the defendants,

24 BABAK BROUMAND,
25 MALAMATENIA BROUMAND,
a/k/a MALAMATENIA MAVROMATIS,

26 did knowingly make false statements and reports for the purpose of influencing the actions of Union
27 Bank, a financial institution insured by the FDIC, in connection with a loan application for the purchase
28

of defendants' \$1.7 million primary residence on Rancho View in Lafayette, California. Specifically, BROUMAND and MAVROMATIS caused to be submitted to Union Bank a Uniform Residential Loan Application for a loan secured by the primary residence on Rancho View Drive, which stated their Second Tahoe House was rented for \$5,500 per month, and caused to be submitted a signed one-year lease, letters, and copies of "rent" checks purporting to show their Second Tahoe House was rented out to M.W. and T.W. for \$5,500 per month for one year, when in fact, as BROUMAND and MAVROMATIS then knew, the lease agreement and "rent" checks were fraudulent and fictitious because defendants' Second Tahoe House was not rented, and they reimbursed M.W. and T.W. with cash and a check for the "rent" allegedly paid.

All in violation of Title 18, United States Code, Section 1014.

COUNT SEVEN: (26 U.S.C. § 7206(1)-Subscribing To a False Tax Return)

Paragraphs 1 through 17 of this Superseding Indictment are re-alleged and incorporated as if fully set forth here.

On or about April 15, 2016, in the Northern District of California, the defendant,

BABAK BROUMAND

a resident of Lafayette, California, did willfully make and subscribe a U.S. Return of Partnership Income, Form 1065, for the calendar year 2015, for Love Bugs, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter. On that income tax return, which was prepared and signed in the Northern District of California and was filed with the IRS, BROUMAND reported gross receipts on line 1a of \$502,002, whereas, as he then and there knew, he failed to report additional income of \$14,607 from customer checks.

All in violation of Title 26, United States Code, Section 7206(1).

COUNT EIGHT: (26 U.S.C. § 7206(1) -Subscribing To a False Tax Return)

Paragraphs 1 through 17 of this Superseding Indictment are re-alleged and incorporated as if fully set forth here.

On or about April 15, 2016, in the Northern District of California, the defendant,

BABAK BROUMAND

a resident of Lafayette, California, did willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040, for the calendar year 2015, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter. On that income tax return, and its attachments, including Schedules K-1 and E, which was prepared and signed in the Northern District of California and was filed with the IRS, BROUMAND only reported 50% of the Love Bugs partnership income, which also failed to include all gross receipts, and failed to report either the sales of the First Tahoe House and the two Texas condominiums, or the approximately \$199,000 in capital gains derived therefrom, whereas, as he then and there knew, 100% of partnership income, real property sales, and capital gains should have been reported, and the partnership income did not include gross receipts from checks and cash.

All in violation of Title 26, United States Code, Section 7206(1).

COUNT NINE: (26 U.S.C. § 7206(1)-Subscribing To a False Tax Return)

Paragraphs 1 through 17 of this Superseding Indictment are re-alleged and incorporated as if fully set forth here.

On or about April 10, 2017, in the Northern District of California, the defendant,

BABAK BROUMAND

a resident of Lafayette, California, did willfully make and subscribe a U.S. Return of Partnership Income, Form 1065, for the calendar year 2016, for Love Bugs, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter. On that income tax return, which was prepared and signed in the Northern District of California and was filed with the IRS, BROUMAND reported gross receipts on line 1a of \$527,124, whereas, as he then and there knew, he failed to report additional income of \$8,593 from customer checks.

All in violation of Title 26, United States Code, Section 7206(1).

COUNT TEN: (26 U.S.C. § 7206(1)-Subscribing To a False Tax Return)

Paragraphs 1 through 17 of this Superseding Indictment are re-alleged and incorporated as if fully set forth here.

On or about June 1, 2017, in the Northern District of California, the defendant,

1 BABAK BROUMAND

2 a resident of Lafayette, California, did willfully make and subscribe a U.S. Individual Income Tax
3 Return, Form 1040, for the calendar year 2016, which was verified by a written declaration that it was
4 made under the penalties of perjury and which he did not believe to be true and correct as to every
5 material matter. On that income tax return, and its attachments, including Schedules E and K-1, which
6 was prepared and signed in the Northern District of California and was filed with the IRS,
7 BROUMAND reported only 50% of the Love Bugs partnership income, which also failed to include all
8 gross receipts, whereas, as he then and there knew, 100% of partnership income should have been
9 reported and the partnership income did not include gross receipts from checks and cash.

10 All in violation of Title 26, United States Code, Section 7206(1).

11 COUNT ELEVEN: (26 U.S.C. § 7206(1)-Subscribing To a False Tax Return)

12 Paragraphs 1 through 17 of this Superseding Indictment are re-alleged and incorporated as if
13 fully set forth here.

14 On or about April 15, 2018, in the Northern District of California, the defendant,

15 BABAK BROUMAND

16 a resident of Lafayette, California, did willfully make and subscribe a U.S. Individual Income Tax
17 Return, Form 1040, for the calendar year 2017, which was verified by a written declaration that it was
18 made under the penalties of perjury and which he did not believe to be true and correct as to every
19 material matter. On that income tax return, and its attachments, including Schedule E, which was
20 prepared and signed in the Northern District of California and was filed with the IRS, BROUMAND
21 reported a -\$6,215 loss from partnership income on Line 17 and Schedule E, for both partners (100%),
22 which failed to include all gross receipts, whereas, as he then and there knew, the partnership loss did
23 not include gross receipts from checks.

24 All in violation of Title 26, United States Code, Section 7206(1).

25 COUNT TWELVE: (26 U.S.C. § 7206(1)-Subscribing To a False Tax Return)

26 Paragraphs 1 through 17 of this Superseding Indictment are re-alleged and incorporated as if
27 fully set forth here.

28 On or about March 15, 2018, in the Northern District of California, the defendant,

BABAK BROUMAND

a resident of Lafayette, California, did willfully make and subscribe a U.S. Return of Partnership Income, Form 1065, for the calendar year 2017, for Love Bugs, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter. On that income tax return, which was prepared and signed in the Northern District of California and was filed with the IRS, BROUMAND reported gross receipts on line 1a of \$393,131, whereas, as he then and there knew, he failed to report additional income of \$3,630 from customer checks.

All in violation of Title 26, United States Code, Section 7206(1).

DATED: 3/24/2022

A TRUE BILL.

/s/

FOREPERSON

STEPHANIE M. HINDS
United States Attorney



RUTH C. PINKEL
MICHAEL J. MORSE
Special Assistant United States Attorneys

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☐ INDICTMENT☒ SUPERSEDING**OFFENSE CHARGED**

Counts 1-3: 18 U.S.C. § 1001 (a)(2) False Statement to Govt Agency

Counts 4-6: 18 U.S.C. § 1014 False Statement to a Financial Institution

Counts 7-12: 26 U.S.C. § 7206(1) -Subscribing To a False Tax Return

☐ Petty☐ Minor☐ Misdemeanor☒ Felony

PENALTY: See attached.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

Babak Broumand

DISTRICT COURT NUMBER

CR 21-162-WHO

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

IRS Special Agent Mark Silva

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. ATTORNEY ☐ DEFENSESHOW
DOCKET NO.☒ this prosecution relates to a pending case involving this same defendantMAGISTRATE
CASE NO.☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form Stephanie M. Hinds

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Ruth Pinkel & Michael Morse

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

1) ☒ If not detained give date any prior summons was served on above charges April 20, 20212) ☐ Is a Fugitive3) ☒ Is on Bail or Release from (show District)

U.S. v. Broumand, Central District CR 20-224(A)-RGK

IS IN4) ☐ On5) ☐ On6) ☐ Await

If a

Has del
been filDATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**FILED**

Mar 24 2022

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☒ SUMMONS ☐ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☒ Arraignment ☒ Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

1450 Rancho View Drive, Lafayette, CA 94549

Date/Time: _____ Before Judge: _____

Comments:

Mar 24 2022

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

PENALTY SHEET

COUNTS ONE through THREE:

18 U.S.C. § 1001 (a)(2) (False Statement to Govt Agency)

Maximum 5 years prison

Maximum 3 years supervised release following incarceration

Maximum \$250,000 fine

\$100 special assessment

COUNTS FOUR through SIX:

18 U.S.C. § 1014 (False Statement to a Financial Institution)

Maximum 30 years prison

Maximum 5 years supervised release following incarceration

Maximum \$1 million fine

\$100 special assessment

COUNTS SEVEN through TWELVE:

26 U.S.C. § 7206(1) -Subscribing To a False Tax Return

Maximum 3 years prison

Maximum 1 year supervised release following incarceration

Maximum \$250,000 fine

\$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☐ INDICTMENT☒ SUPERSEDING**OFFENSE CHARGED**

Counts 4 & 6: 18 U.S.C. § 1014 False Statement to a Financial Institution

- ☐ Petty
- ☐ Minor
- ☐ Misdemeanor
- ☒ Felony

PENALTY: See attached

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

Malamatenia Mavromatis

DISTRICT COURT NUMBER

CR 21-162-WHO

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

IRS Special Agent Mark Silva

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. ATTORNEY ☐ DEFENSESHOW
DOCKET NO.☐ this prosecution relates to a pending case involving this same defendantMAGISTRATE
CASE NO.☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form Stephanie M. Hinds

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

Ruth Pinkel & Michael Morse

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

1) ☒ If not detained give date any prior summons was served on above charges2) ☐ If3) ☐ If**IS**4) ☐ C5) ☐ C6) ☐ A

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

FILED

Mar 24 2022

Mark B. Busby

CLERK, U.S. DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☒ SUMMONS ☐ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☒ Arraignment ☒ Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

1450 Rancho View Drive, Lafayette, CA 94549

Date/Time: _____ Before Judge: _____

Comments:

PENALTY SHEET

COUNTS FOUR and SIX:

18 U.S.C. § 1014 (False Statement to a Financial Institution)

Maximum 30 years prison

Maximum 5 years supervised release following incarceration

Maximum \$1 million fine

\$100 special assessment

FILED

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